<u>**Remarks**</u>

In view of the following remarks, Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1, 9, and 18 have been amended herein. Claims 1-26 are pending.

<u>**Statement of Substance of Examiner Interview dated 1/29/08**</u>

Applicant would like to sincerely thank Examiner Swearingen for his time in discussing this application over the phone on 1/29/08 with Applicant's attorney, Daniel T. McGinnity.

During this interview, the §103 rejections over Levergood in view of Garrick were discussed. Applicant's attorney submitted differences between the cited references and the claimed subject matter. In particular, Levergood appears to be directed at techniques to perform redirection for authentication which are not equivalent to the recited features. Garrick does not correct these defects in Levergood. Levergood and Garrick, alone or in combination, fail to describe replacing of links with modified links. Redirection as discussed in Levergood and Garrick is not equivalent to the recited techniques.

Nevertheless, in the interest of expediting allowance of the subject application and without conceding the propriety of the rejection, amendments to further clarify these differences were proposed. The Examiner provided helpful input on the proposed amendments. The Applicant understood the Examiner as

tentatively agreeing that the proposed amendments would overcome the art of record.

Accordingly, amendments have been made to the independent claims herein in the spirit of those discussed during the interview. The Applicant submits that all of the pending claims are in condition for allowance. If any issues remain that would prevent the allowance of the application, Applicant requests that the Examiner contact the undersigned attorney to resolve the issues.

35 U.S.C. §103

Claims 1-26 are rejected under 35 U.S.C. §103(a) as allegedly being un-patentable over U.S. Patent No. 5,708,790 ("Levergood") in view U.S. Patent No. 5,708,780 ("Garrick"). Applicant respectfully disagrees.

Nevertheless, in the interest of expediting allowance of the subject application and without conceding the propriety of the outstanding rejections, amendments have been made to the independent claims herein in the spirit of those discussed during the interview on 1/29/08.

Claim Amendments

Each of the independent claims 1, 9, and 18 has been amended herein to clarify replacement of links in a web page with modified selectable links to enable tracking through client side tracking code. For example:

Claim 1 as amended (portions of the amendment appear in bold/italics)

recites a method, comprising:

- receiving a request from a client to view a web page that includes one or more selectable links;
- ***inspecting each of the one or more selectable links included with the requested web page*** to determine if the one or more selectable links contain a respective link identifier, the respective link identifier configured to designate a corresponding selectable link to be tracked via a tracking system;
- replacing each of the one or more selectable links identified as containing the respective link identifier with a modified link that contains a tracking identifier for use in the tracking system to track the corresponding selectable link;
- injecting client-side tracking code into the web page, the client-side tracking code being configured to run tracking procedures on the client when one of said modified links is selected to cause redirection to a corresponding location;
- ***communicating the web page having said modified links and the client-side tracking code so that the web page is viewable at the client***;
- monitoring for a selection of one of said modified links; and
- when one of said modified links is selected to cause redirection to said corresponding location, communicating with the client to initiate the client-side tracking code to execute a tracking function that records information related to the corresponding selectable link in a log file.

Claim 9 as amended (portions of the amendment appear in bold/italics)

recites a system, comprising:

- a processor;
- a memory coupled to the processor;
- web content in the form of one or multiple web pages stored in the memory, one said web page containing a selectable link that includes a link identifier;
- a tracking module stored in the memory and executable via the processor, the tracking module, when executed, configured to:
  - ○ ***responsive to a request from a client to view the one said web page, replace the selectable link of the one said web page with a modified link that includes a tracking identifier in place of the link identifier of the selectable link***;

○ inject client-side tracking code into the web page that contains the modified link; and

○ *communicate the one said web page having the modified link and the client-side tracking code to the requesting client;* and

○ call the client-side tracking code to execute and initiate a tracking event with a tracking system when the modified link is selected to cause redirection to a corresponding location.

Claim 18 as amended (portions of the amendment appear in bold/italics) recites one or more computer-readable storage media containing computer-executable instructions that, when executed on a computer, perform the following steps:

- *replacing selectable tracking links in a web page requested by a client with modified selectable links that each include a tracking identifier for use with a tracking system to track a corresponding selectable tracking link;*

- injecting client-side code into the requested web page, the client-side code being configured to run at client to initiate a tracking event when one of said modified selectable links is clicked;

- *communicating the requested web page having the modified selectable links and the client-side code to the client;*

- initiating execution of the client-side code upon determining that one of said modified selectable links has been clicked at the client; and

- providing tracking information to a tracking system configured to log information related to the one said modified selectable link and the selection thereof.

Thus, each of claims 1, 9, and 18 as amended includes, in varying terms and scope, communication of a web page having links replaced with modified links to a client to enable initiation of tracking functions at the client. Support for the amendments can be found throughout Applicant's Specification. Particular attention, however, is drawn to the Specification, FIG. 1; p. 11 lines 7 – p.14 line17; and FIG. 5. These examples described replacement of links in a web page

with modified selectable links within the spirit of the amendments made in the independent claims. The cited references Levergood and Garrick fail to disclose, teach, or suggest any such subject matter.

In the interview 1/29/08, Examiner Swearingen agreed that incorporation of the above noted features into each of the independent claims would overcome the present rejections. The Examiner acknowledged that the references of record, Levergood and Garrick fail to disclose, teach, or suggest any such subject matter.

Specifically, Levergood appears directed at authentication redirection techniques. The redirection to an alternate link as in Levergood is not equivalent to and may further be incompatible with the claimed subject matter which is related to tracking. Further, the recited "inspecting" of links in a web page and "replacing" of the links with modified tracking links does not appear in the proposed combination of references. In making out the rejections on p. 3 The Office Action does not even specifically address these recited aspects of claims 1, 9, and 18. Thus, Applicant respectfully asserts that a *prima facie* case of obviousness has not been established for at least these reasons.

Moreover, the redirection of Levergood occurs directly without a modified selectable link ever being communicated to a client. Thus, part of what is lacking in the proposed combination is providing a web page to a client that has replaced certain links with modified links, and then using the modified links when selected to initiate tracking at the client with client side code. For instance, the redirection techniques of Levergood are (1) initiated from a normal un-modified link (2) and

occur by redirection at the server side. See, for example, Levergood at col. 6. lines 27-57 cited in the rejection, "The content server may redirect the client to an authentication server" etc. As such Levergood is directed at server side redirection techniques and fails to disclose the amended feature of "communicating the web page having said modified links and the client-side tracking code so that the web page is viewable at the client".

Likewise, Garrick at col. 8 lines 4-56 relied upon by the Examiner in making out the rejection describes distribution of users to different alternate versions of a web page (echo sites). To accomplish this, viewers in Garrick are redirected by a web server. Specifically, Garrick at col. 8 lines 17-21 describes that "the web server software is configured in step 46 to redirect all requests for the target page or original home page to the original home page as well as the alternate pages as illustrated in FIG. 22, for example." Thus, like Levergood, Garrick describes redirection techniques performed on the server side. However, Garrick is silent as to "inspecting" of links in a web page and "replacing" of the links with modified tracking links. As such, Garrick also fails to disclose the amended feature of "communicating the web page having said modified links and the client-side tracking code so that the web page is viewable at the client".

Thus, it is submitted that the proposed amendments clarify recited aspsects of the claims relative to the server side redirection techniques of Levergood and Garrick. As such, claims 1, 9, and 18 as presently recited and their respective

dependent claims are allowable and the withdrawal of the §103 rejections is respectfully requested.

For at least the foregoing reasons, withdrawal of the §103 rejections of claims 1-26 is respectfully requested.

Conclusion

Claims 1-26 are in condition for allowance and the Applicant respectfully requests reconsideration and prompt issuance of the present application. Should any issue remain that prevents immediate issuance of the application, the Examiner is requested to contact the undersigned attorney to discuss the unresolved issue.

Respectfully submitted,

Date: _____2/29/2008_____   By: ___/Daniel T. McGinnity, #55444/___
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